REPORT ON INSPECTION TO DETERMINE

COMPLIANCE WITH PCB REGULATIONS

Sky Valley Education Center
351 Short Columbia Street
Monroe, Washington 98272

October 24. 2019

PERFORMED BY:

U.S. ENVIRONMENTAL PROTECTION AGENCY
PESTICIDES AND TOXIC SUBSTANCES BRANCH
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

PCB COMPLIANCE INSPECTION REPORT

I. OBJECTIVES

The inspection was conducted to document the facility's handling, storage and disposal practices and to determine its compliance with the PCB Regulations, 40 CFR Part 761, as published in the Federal Register of May 31, 1979, and as amended.

II. COMPANY IDENTIFICATION

Sky Valley Education Center
351 Short Columbia Street
Monroe, Washington 98272

RESPONSIBLE OFFICIAL
Devlin Piplic, Director of Facilities

III. DATE OF INSPECTION

October 24, 2019

IV. PARTICIPANTS

Company
Devlin Piplic, Director of Facilities

U.S. EPA
Kendall Moore, Environmental Scientist, Author
Kenneth Zolnierczyk, Environmental Engineer, Co-author

V. COMPANY BACKGROUND [X] PCBs [] No PCBs discovered

Sky Valley Education Center (Sky Valley) is a public school in the Monroe Public School system that operates as an alternative school for alternative learning experience requirements. The school enrolls Washington home-schooled students for grades K through 12.

In 2016, Sky Valley completed removal of PCB containing light fixtures, removal and encapsulation of PCB containing caulk, removal of PCB contaminated carpeting and air monitoring for PCBs. These actions also resulted in the removal of asbestos containing caulk and mercury containing bulbs.

On September 8, 2016 Monroe Public Schools notified EPA Region 10 of completion of these activities. The remediation is outlined in a final report compiled by PBS Environmental + Engineering dated October 2016. Some inaccessible PCB containing material was granted a risk based disposal by EPA Region 10 on September 15, 2017.

This inspection is being conducted to determine the current compliance status of Sky Valley with the PCB regulations.

VI. INSPECTION SUMMARY

Opening Conference

A. The inspector met with company officials as indicated in Section II, presented TSCA Inspection Credentials, explained the purpose of the inspection, and presented for signature the TSCA Inspection Forms as indicated below:

[X] Notice of Inspection
[X] TSCA Confidentiality Notice
[X] Receipt for Samples/Documents collected

B. Circumstances Applicable to this inspection

[] Disposal
[X] Marking
[X] Storage
[ ] Manufacturing
[] None of the Above

[ ] Processing
[ ] Distribution
[ ] Authorizations
[X] Record keeping

C. CITATION

[X] Not Applicable
[ ] Citation issued on
[ ] Response received on

D. Closing Conference

[X] The inspector(s) explained the three possible outcomes of the inspection and informed the company officials that a final determination and notification would be made by the Regional Office.

VII. SAMPLES/ PHOTOGRAPHS/ DOCUMENTS

[X] See Attachments as listed

VIII. ATTACHMENTS

A. Notice of Inspection
TSCA Inspection Confidentiality Notice
Receipt for Samples and Document

B. Photographs
C. Facility Records

IX. INSPECTOR'S COMMENTS

_X_ Disposal _X_ Marking ___ Use/Authorizations

_X_ Storage __ Record keeping ___ Manufacturing/

Processing ___ Distribution ___ Other

Note, the scope of this PCB inspection is limited to PCB contamination previously identified at Sky Valley

Administration Building

Visual inspection the storage/IT closet of the administrative building revealed 2 older light fixtures that appear to be the same model/type suspected to contain PCBs. The school previously certified that all these type fixtures had been removed from the school and properly disposed.

The light fixtures were opened to expose the light ballasts for examination. Although each fixture had new electronic ballasts, both had signs of spilled potting indicative of the kind used in PCB fluorescent light ballasts (PCB FLBs). A sample and photographs were collected (see attached photo and sample log). Visual of inspection of the other light fixtures didn't reveal any additional older fixtures that were suspected to contain PCB FLBs.

Gym Building

The CTE room of the Gym Building was inspected. Previous wipe samples of the epoxy coating used in this room indicated PCBs at 3.3 µg/100cm^2. The epoxy coating here appears to be thicker than epoxy the inspector has seen in other places. A wipe sample was collected from the same location that was previously tested. Additionally, a wipe sample was collected from the top of the room refrigerator to determine if air borne dust containing PCBs could be the source of PCBs found room surfaces, which includes he epoxy coating (see photo and sample log).

POD Building

The POD Building was inspected, and it appears that all light fixtures in the building have been replaced with newer light fixtures that are not suspected to contain PCB FLBs. A room ventilator was inspected. According to Mr. Piplic the carpet underneath each ventilator was removed. Inspection of one unit confirmed that the carpet was removed, and the filters were being changed on a quarterly basis (see photo log). Two ventilator filters were collected and sent to the lab for analysis.

An earlier report about PCBs remaining at the school stated there was still carpeting remaining in one classroom that may have been impacted by PCBs. That room was inspected and the carpet that remained is a residual amount that is underneath a wall and can not be removed without demolition of the wall (see photo log).

Annex Building

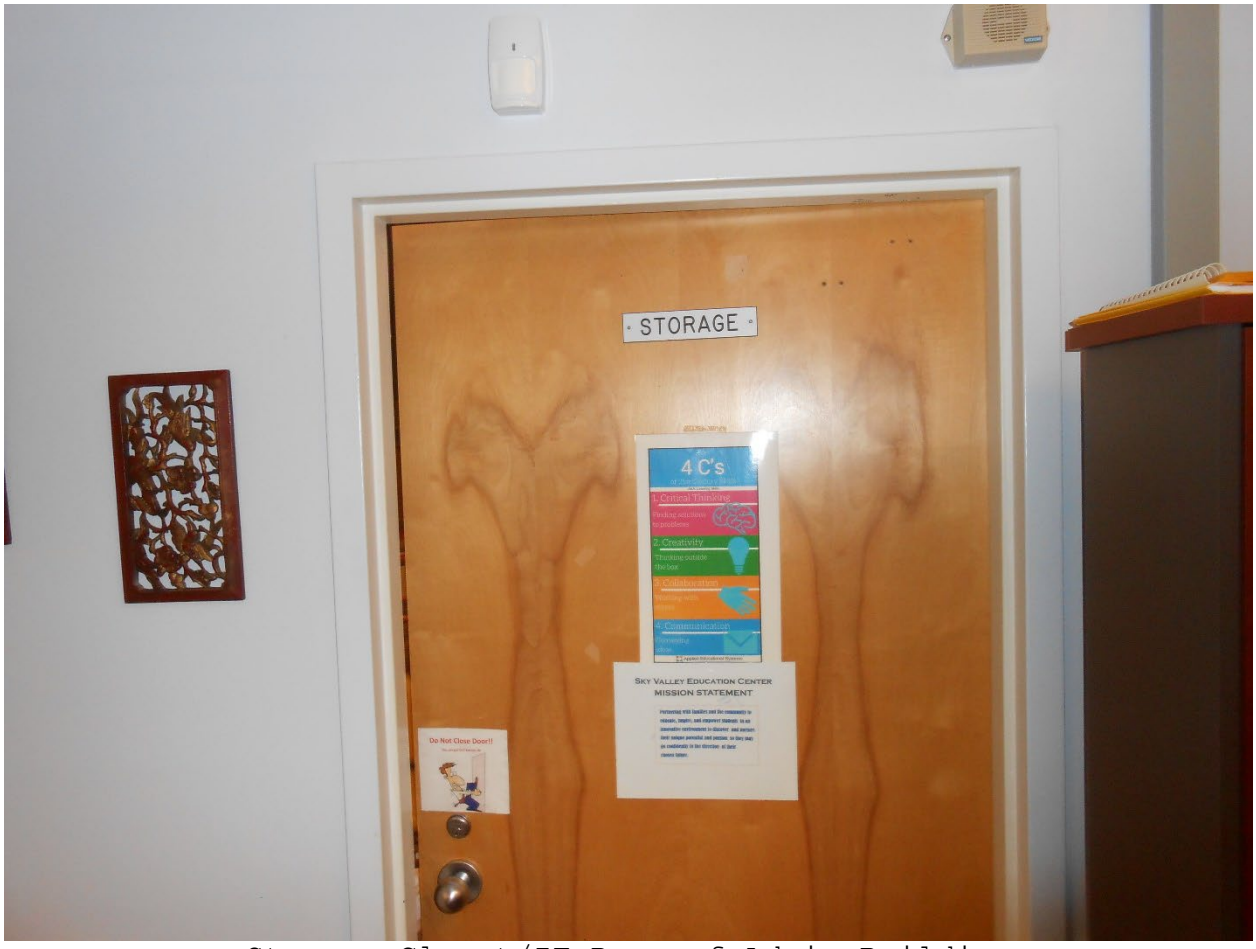
The Annex Building was inspected. Samples were collected from two hallway heaters. One heater was located by the exit door leading out to the Admin Building. The second unit is situated approximately 30 feet down from the first (see photo and sample log). Also, in the Annex Building, samples were collected to test the integrity of the encapsulation in Room D. A sample was collected from the window encapsulation and from the top of file cabinet located in the room (see sample log).

Off Site Storage Area

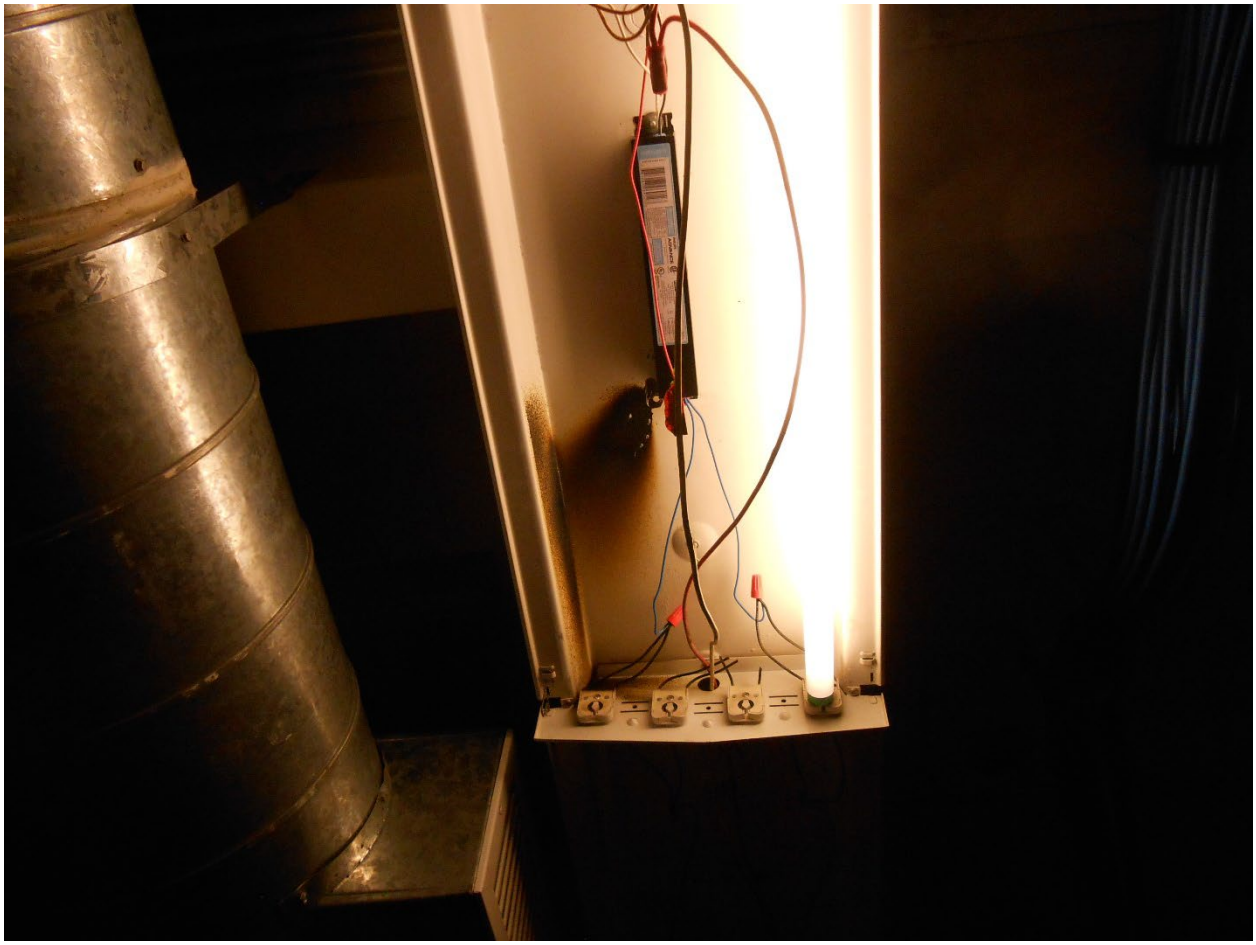
The off site storage area was also inspected. This storage area is on property owned by the school district approximately 2 miles from Sky Valley Education Center. The door to the storage area had a hazardous waste placard but did not have an M_L label as required by 40 CFR 761.40. Inside the storage area there was a 55 gallon drum marked with the M_L label that contained yellow plastic bags. Each bag was individually labeled with the date removed from service. The 55 gallon drum was in a plastic tote that served as secondary containment. In addition to the items in the drum there were also two yellow plastic bags that were not contained in a drum. These bags contained light fixtures. Mr. Piplic stated these bags contained light fixtures that were removed during the light replacement project but overlooked when the other fixtures were sent for disposal. Piplic wasn't clear as to why the fixtures were not disposed of immediately after they were discovered but did state that currently disposal wasn't allowed because of a litigation hold.

SKY VALLEY EDUCATION CENTER
OCTOBER 23-24, 2019
SAMPLE LOG

SAMPLE LOCATION	SAMPLE NUMBER	SAMPLE TYPE	SAMPLE DATE	RESULT
Admin Building storage closet light fixture	S01	Wipe	10/23/19	**1.3 ug/wipe Aroclor 1242**
Admin Building storage closet light fixture	S02	Solid sample of potting material	10/23/19	**8.3 mg/kg Aroclor 1242**
Admin Building storage closet 2nd light fixture	S03	Wipe	10/23/19	**18 ug/wipe Aroclor 1242**
Gym CTE Room Refrigerator top	S04	Wipe	10/23/19	<0.25 ug/wipe
Gym CTE Room window encapsulation area	S05	Wipe	10/23/19	<0.25 ug/wipe
Annex Building Room D window encapsulation	S06	Wipe	10/23/19	<0.25 ug/wipe
Annex Building Room D top of file cabinet	S07	Wipe	10/23/19	<0.25 ug/wipe
Annex Building internal hall heater	S08	Wipe	10/24/19	<0.25 ug/wipe
Annex Building external hall heater	S09	Wipe	10/24/19	<0.25 ug/wipe
Used ventilator filter	F01	Whole filter	10/23/19	**760 ug/kg 1242 1900 ug/kg 1254 1800 ug/kg 1260**
Used ventilator filter	F02	Whole filter	10/23/19	**900 ug/kg 1242 980 ug/kg 1254 730 ug/kg 1260**
Admin Building storage closet Blank	RO1	Wipe	10/23/19	<0.25 ug/wipe
Admin Building storage closet solid blank	R02	Solid (empty 4oz. jar)	10/23/19	<25 ug/kg
Clean ventilator filter	R03	Clean filter	10/23/19	<10 ug/kg



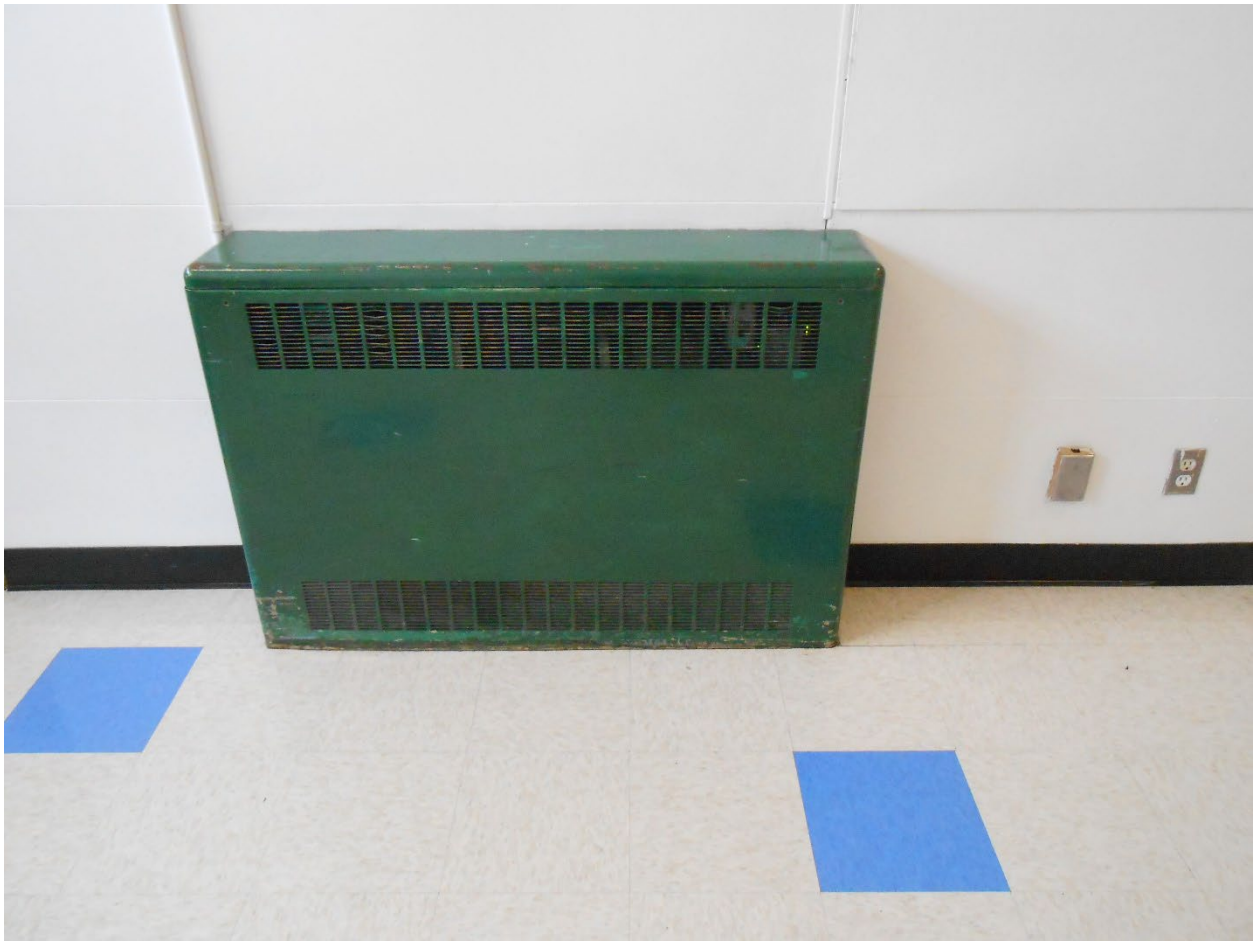
Storage Closet/IT Room of Admin Building



Light Fixture in storage closet of Admin Building with signs of potting material



Potting material on light fixtures in the storage closet of the Admin Building



Internal hall heater in Gym Building



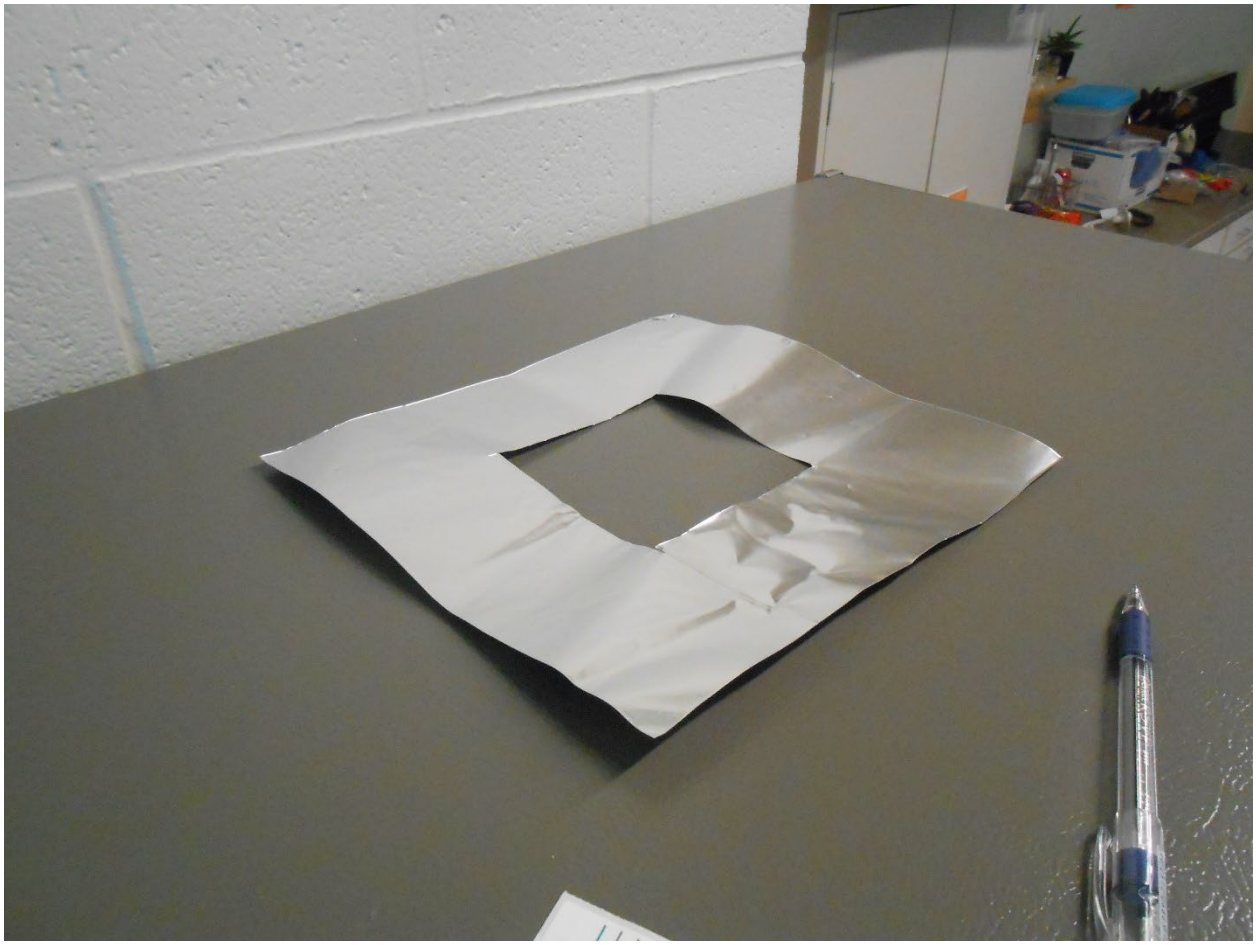
Carpet underneath wall of POD building



Epoxy coating of Annex Building (CTE Room)



Close up view of Photo _____



Wipe sample template top of refrigerator in CTE Room of Annex Building



Carpet adhesive at bottom of Room Ventilator in POD Building



Air filter in ventilator of POD Building



Used air filters from Ventilators in POD Building



Entry door to PCB Storage Area



Sign on PCB Storage Area used to indicate PCBs are present



PCB containing drum in PCB Storage Area



PCB label on drum in PCB Storage Area



Light fixtures stored in PCB Storage Area that were not disposed of during previous light fixture replacement project



Light fixtures that were not disposed of during the previous light fixture replacement project